

1 Carl J. Oreskovich, WSBA #12779
2 Andrew M. Wagley, WSBA #50007
3 Etter, McMahon, Lamberson,
4 Van Wert & Oreskovich, P.C.
5 618 West Riverside Avenue, Suite 210
6 Spokane, WA 99201
7 (509) 747-9100
8 (509) 623-1439 Fax
9 Email: carl@ettermcmahon.com
10 Email: awagley@ettermcmahon.com

11 *Attorneys for Defendant Ronald Craig Ilg*

12 UNITED STATES DISTRICT COURT
13 EASTERN DISTRICT OF WASHINGTON

14
15 UNITED STATES OF AMERICA,
16

17 Plaintiff,
18

19 vs.
20

21 RONALD CRAIG ILG,
22

23 Defendant.
24
25

Case No. 2:21-cr-00049-WFN

**DEFENDANT'S MOTION FOR
OVERLENGTH BRIEF RE:
DEFENDANT'S MOTION TO
REVOKE PRETRIAL DETENTION
ORDER**

With Oral Argument:
November 18, 2021 at 11:00 am
Via Videoconference

26
27 COMES NOW, the Defendant RONALD CRAIG ILG, by and through his
28 attorneys of record, Carl J. Oreskovich and Andrew M. Wagley of Etter,
29 McMahon, Lamberson, Van Wert & Oreskovich, P.C., and hereby moves the
30
31
32

1 Court for an Order permitting Defendant to submit an overlength brief for
2
3 Defendant's Motion to Revoke Pretrial Detention Order. In the accompanying
4
5 Motion to Revoke Pretrial Detention Order, the Defendant respectfully requests
6
7 the Court revoke his pretrial detention and grant his release from custody
8
9 pending trial.

10 Pursuant to LCivR 7(f)(2), "[n]ondispositive motions . . . shall not exceed
11
12 10 pages." In turn, LCivR 7(b)(3) indicates "[a] 'dispositive motion' is a motion
13
14 requesting summary judgment, judgment on the pleadings, dismissal, remand, or
15
16 permanent injunctive relief. A 'nondispositive motion' is a motion seeking any
17
18 other relief." As such, pursuant to LCivR 7, Defendant's to Revoke Pretrial
19
20 Detention Order is a "nondispositive motion" that is subject to a 10-page limit.
21
22 However, page limits "may only be exceeded by obtaining prior approval of the
23
24 Court. A motion to exceed page limits must demonstrate good cause and recite
25
26 the opposing party's position." LCivR 7(f)(5).

27 Defendant's Motion to Revoke Pretrial Detention Order is brought
28
29 pursuant to the Bail Reform Act ("BRA"), 18 U.S.C. § 3141, *et seq.*, along with
30
31 the Due Process Clause. In addition, Defendant's Motion is supported by the
32
Forensic Psychological Evaluations of two expert witnesses. The various in-

1 depth analysis required under the BRA and Due Process Clause would be
2
3 insufficient in a brief under 10-pages. Moreover, Assistant United States
4
5 Attorney Richard Barker has been apprised of this Motion for Overlength Brief
6
7 and indicated the United States has no objection. As such, good cause exists to
8
9 grant this Motion for Overlength Brief.

10 RESPECTFULLY SUBMITTED this 10th day of November, 2021.

11 ETTER, McMAHON, LAMBERSON,
12 VAN WERT & ORESKOVICH, P.C.
13

14
15 By: /s/ Andrew M. Wagley

16 Carl J. Oreskovich, WSBA #12779

17 Andrew M. Wagley, WSBA #50007

18 *Attorneys for Defendant Ronald Craig Ilg*
19
20
21
22
23
24
25
26
27
28
29
30
31
32

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury of the laws of the United States and the State of Washington that on the 10th day of November, 2021, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF System, which will send electronic service to all attorneys of record.

EXECUTED this 10th day of November, 2021 in Spokane, WA.

By: /s/ Jodi Dineen
Jodi Dineen